

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK

3 -----x

4 MEDIDATA SOLUTIONS, INC.

5 Plaintiff,  
6 Civil Action No.:  
7 1:15-cv-000907-ALC

-against-

8

9 FEDERAL INSURANCE COMPANY,

10 Defendant.

11 -----x

12

13

14

15

16 VIDEOTAPED DEPOSITION of a Non-Party  
17 Witness, [REDACTED], taken by the Defendant,  
18 pursuant to Subpoena, held at the offices of  
19 Gordon & Rees, LLP, One Battery Park Plaza, New  
20 York, New York, 10004, on June 25, 2015, at  
21 1:41 p.m. before a Notary Public of the State  
22 of New York.

23

24

25

=====

1

[REDACTED]

2 confuse you in any way. So if you don't  
3 understand what I'm asking you, please tell me.  
4 I'll be happy to rephrase it so you can  
5 understand what I'm asking. But if you don't  
6 say anything I'm going to assume you understood  
7 the question as it was asked. Okay?

8 A. Okay.

9 Q. Finally, there may come a time when  
10 Medidata's attorney would like to interpose an  
11 objection to one of my questions, which he's  
12 entitled to do. Unless you're told not to  
13 answer the question or you don't understand the  
14 question, you can go ahead and answer it.  
15 Okay?

16 A. Okay.

17 Q. If you'd like to take a break, at any  
18 time I'm happy to do that. My only request is  
19 that if I have a question pending you answer it  
20 before we take the break. Okay?

21 A. Okay.

22 Q. Can you give me a brief summary of your  
23 educational background?

24 A. I have a BS in Graphic Design. Started  
25 off as a business major at Virginia State

---

---

1

[REDACTED]

2 University.

3 Q. When did you graduate?

4 A. '94, I think.

5 Q. Do you have any training in accounting?

6 A. Yes.

7 Q. What type of training do you have in  
8 accounting?

9 A. Just CPE courses that I've taken  
10 throughout my career at different companies.  
11 They offer training and I just went for  
12 different coursework. Auditing, accounts, cost  
13 accounting. Different kinds of accounting  
14 courses throughout the years.

15 Q. Have you ever taken any courses on fraud  
16 prevention?

17 A. Yes.

18 Q. And how many courses have you taken on  
19 fraud prevention?

20 A. I have taken the courses offered to me  
21 from Medidata after the wire fraud took place  
22 and I have had those same courses taken or  
23 similar courses taken at my current employment.

24 Q. Did you have any training in fraud  
25 prevention prior to September of 2014?

=====

1

[REDACTED]

2 A. No.

3 Q. You mentioned Medidata. When did you  
4 work at Medidata?

5 A. From October of 2009, I believe, until  
6 October of 2014.

7 Q. Where do you currently work?

8 A. At [REDACTED].

9 Q. What do you do there?

10 A. I'm an [REDACTED].

11 Q. How long have you been there?

12 A. Since December of 2015.

13 Q. When you first became employed by  
14 Medidata, did you receive any training on their  
15 policies and procedures?

16 A. No. So I started off as a [REDACTED]  
17 for about four months and then they hired me  
18 after -- I think it was February 22nd of 2010 I  
19 became a full-time employee of Medidata.

20 During that time, no, there was no training as,  
21 you know, code of conduct or policies. In  
22 fact, I didn't even know where those policies  
23 were kept, so.

24 Q. When you first became a full time  
25 employee of Medidata what was your position?

=====

1

2 A. [REDACTED].

3 Q. Can you tell me what [REDACTED] stands for?

4 A. I'm sorry, it's [REDACTED]

5 [REDACTED]. And so basically I processed  
6 all the expense reports for the company and  
7 their reimbursements.

8 Q. How long did you hold that position?

9 A. Three years.

10 Q. Were you promoted at that point?

11 A. Yes.

12 Q. What were you promoted to?

13 A. [REDACTED].

14 Q. What were your responsibilities as  
15 [REDACTED]?

16 A. Basically, just making sure that all  
17 invoices were coded correctly, entered into the  
18 system. New supplier forms or new vendor forms  
19 were filled out and signed before being entered  
20 into the accounting system. Insuring all  
21 payments were made. During my 10 years as  
22 [REDACTED] we went from check  
23 vendor to implementing electronic payments. So  
24 I oversaw that whole project and rolled out  
25 where we were able to make electronic payments.

---

---

1

2 Q. When you say electronic payments, were  
3 those ACH transfers or electronic?

4 A. ACH transactions. We always made wire  
5 transactions, but ACH is basically batch  
6 payments sent electronically to a bank rather  
7 than going into a bank portal and individually  
8 wiring funds.

9 Q. When did you first become involved in  
10 issuing wire transfers for Medidata?

11 A. Once I became [REDACTED].

12 Q. Were you ever an authorized signatory on  
13 any Medidata bank accounts?

14 A. No.

15 Q. So because you weren't an authorized  
16 signatory you were not able to approve wire  
17 transfers, correct?

18 A. Exactly. So basically I would be go in  
19 and set up. Anyone in AP would be able to go  
20 in and set up a transaction in the bank or in  
21 our accounting system, which would then be  
22 uploaded to the bank portal. But no one in  
23 accounts payable was ever actually authorized  
24 with the bank or the company to release any  
25 funds, so no money was actually moved during

---

---

1

[REDACTED]

2 that time. There would be authorized  
3 signatories of the bank accounts that would  
4 actually go into the bank portal and release  
5 funds, approve them to be released.

6 Q. So in order for money to actually be  
7 moved, one of the authorized signatories would  
8 have to go into the bank portal to release the  
9 transactions?

10 A. Correct.

11 Q. Did that apply to ACH transfers as well?

12 A. Correct. All disbursements.

13 Q. Let's just separate ACH from wire  
14 transfer for a moment. If you were setting up  
15 batch ACH transactions for Medidata you would  
16 set those up in Medidata's software system?

17 A. Yes.

18 Q. And then once the entirety of the batch  
19 was set up the transactions would then be  
20 electronically transmitted to the bank?

21 A. Yes.

22 Q. And when the transactions had been  
23 received by the bank, the third step would be  
24 for someone, an authorized signer, to go in and  
25 approve the transactions to go out?

---

---

1

[REDACTED]

2 A. Exactly.

3 Q. Did all transfers, as far as you know,  
4 require two authorized signers?

5 A. Anything over \$25,000, USD or the  
6 equivalent.

7 Q. For a wire transfer, when you were  
8 setting up a wire transfer, could you actually  
9 set the wire transfer up using Medidata's  
10 software system or would you have to go into  
11 the bank's?

12 A. For wires, no. I would have to go into  
13 the bank portal.

14 Q. And so in order to sign in to the bank  
15 portal, did you have to go on to the Internet?

16 A. Yes.

17 Q. And the bank was Chase, correct?

18 A. Yes. Well, we had two banks, but for  
19 that transaction, yes, it was Chase.

20 Q. When you went to the Chase system, as I  
21 understand it, you would go on to the Internet  
22 and find the Chase website?

23 A. Yes.

24 Q. Did you have to enter any sort of user  
25 ID or password to log into Chase?

---

---

1

2 A. Correct. And we also, Chase gives you a  
3 token that has a number that changes every few  
4 seconds. And you have to have your user ID,  
5 your password, which is registered with Chase,  
6 and that identifying registered fob, if you  
7 will. That actually is registered under your  
8 name, your user ID and when the number changes  
9 you have to put all three of those identifying  
10 codes in there in order to get access.

11 Q. So as I understand it, in order to even  
12 set up a wire transfer you personally have to  
13 go into the system, use your personalized user  
14 ID, your personalized password, plus whatever  
15 number appeared on the fob, just to log in?

16 A. Correct.

17 Q. When you logged in to the system at  
18 Chase, you could only set up the wire, correct?

19 A. Correct.

20 Q. How would you set up a wire using the  
21 Chase system?

22 A. They have a portal once you are logged  
23 in where you can create a payment. You'd go  
24 into the create a payment module. You could  
25 create a payment from a preexisting template,

---

---

1

2 which is someone you've paid already and you've  
3 stored that information. Or you could create a  
4 brand-new one from scratch and you would just  
5 select the debiting account, the crediting  
6 beneficiary account information would be  
7 entered in, dollar amount, any other kind of  
8 extra information that you wanted to put in on  
9 the wire transaction, and then you would submit  
10 it.

11 Q. When you say submit it, what would  
12 happen after you submitted it?

13 A. After it was submitted then the  
14 authorized signatories would be able to view it  
15 when they logged on to Chase. Before  
16 submitting it they would not be able to view  
17 it.

18 Q. So in order for the authorized  
19 signatories to even see a proposed wire  
20 transfer, you would have to go in using your  
21 personalized ID, personalized password and fob,  
22 and set up the wire transfer, correct?

23 A. Correct.

24 Q. When you say submit it, was there some  
25 sort of key that you would have to press in

---

---

1

2 order to kind of move the proposed wire  
3 transfer along?

4 A. Yes, just button says submit.

5 Q. Do you know how many authorized  
6 signatories there were at Medidata in the  
7 September 2014 time frame?

8 A. If I can recollect, there were president  
9 of the company, chairman of the board, CFO,  
10 there were the controller, assistant  
11 controller. We had recently added a couple of  
12 new people so there was the [REDACTED], I  
13 believe, [REDACTED] and my  
14 manager at the time, another VP of finance.

15 Q. Who was your manager at the time?

16 A. Rob Shaw.

17 Q. Did the system, once you had finished  
18 setting up a wire transfer, advise the  
19 authorized signatures that a wire was ready for  
20 review or did you have to go around and find  
21 people to sign it?

22 A. No. Chase would not automatically  
23 notify anyone that there's payment ready for  
24 review, approval or whatever the case may be.  
25 You'd have to notify them either by e-mail or

---

---

1

2 you could just get up and walk and find them  
3 and let them know there's a payment waiting for  
4 them to view and they'd have to go and log into  
5 the bank.

6 Q. When you first became a full-time  
7 employee of Medidata, were you assigned an  
8 e-mail account?

9 A. Yes.

10 Q. How would you access when you turned on  
11 your computer your e-mail account, your  
12 business e-mail account?

13 A. When we started off I know -- trying to  
14 think what system we used. When I left they  
15 were using Google mail, but that wasn't what we  
16 were using previously. But I would just go in,  
17 you know, an app on the desktop. Click it,  
18 open it and log in with my credentials. You  
19 could stay signed in, I believe. So basically  
20 you just had to, you know, when you log in in  
21 the morning and you click on the ap to open up  
22 the e-mail, it should just open up.

23 Q. In September of 2014 was the Medidata  
24 e-mail through Gmail?

25 A. Yes.

---

---

1

2 Q. Would you access this icon that you  
3 click on your desktop, was it a link to Gmail?

4 A. Yes. There's an application. The  
5 information is already stored and saved, so  
6 when you open up your Gmail it would just open  
7 up.

8 Q. Were you ever provided when you were a  
9 full-time employee of Medidata anything which  
10 identified who within the company had authority  
11 to approve on disbursements?

12 A. Is word of mouth. So I never had a  
13 document, if you will, saying these are the  
14 assigned or the approved signatories of these  
15 bank accounts.

16 Q. The wire transfer we're here to talk  
17 about was in excess of \$4 million. I'm  
18 wondering, were you ever provided anything to  
19 indicate who within the company could approve a  
20 \$4 million expenditure?

21 A. Again, word of mouth. Just when I took  
22 on the position nothing was really set in  
23 stone, nothing was, as far as policies and  
24 procedures. We had a control stock document.  
25 Did not list anything as far as who are the

---

---

1

[REDACTED]

2 A. Yes.

3 Q. What were those days?

4 A. I don't remember anymore, but for  
5 vendors I believe it was twice a month.  
6 Wires -- for U.S. vendors I should say was  
7 about twice a month. International vendors,  
8 once a month. But you might have had the  
9 occasional wire that would come through, a wire  
10 request or payment request that was off cycle.

11 Q. And did off cycle payments have to be  
12 separately approved by someone?

13 A. Same people that would normally approve  
14 them.

15 Q. Had you ever, prior to September 16 --  
16 September 2014, been involved in the funding of  
17 the acquisition of a company?

18 A. No.

19 Q. Were you ever provided anything by  
20 Medidata which suggested you the appropriate  
21 protocols when funding the acquisition of a  
22 company?

23 A. No.

24 Q. Prior to September 16, 2014, were you  
25 aware of whether Medidata was involved in

=====

1

[REDACTED]

2 trying to buy companies?

3 A. I know -- no, I didn't know if they were  
4 involved in trying to buy a particular company.  
5 But they had brought (sic) one while I was  
6 there, but not as [REDACTED].7 Prior to that we had had during the 2014  
8 year, our kick-off meeting and quarterly town  
9 hall meetings, if you will. There was lots of  
10 talk that the company is, you know, at this  
11 particular point and we may be looking to, you  
12 know, purchase a company, but not, you know, no  
13 one was set in mind what it would be. Just  
14 saying it might happen. It may not happen. So  
15 the thought was just thrown out there.16 Separately in finance meetings we had  
17 the same talk. That we needed to be ready if  
18 and when the company decided to purchase  
19 something, that anyone that was called upon  
20 needed to make themselves available to make  
21 sure that it happened because it was a timely  
22 situation and it's confidential. So you can't,  
23 you know, as far as like getting it approved by  
24 the SEC. You cannot go around and share that  
25 information of any type of purchase of a

1



2 company or merger.

3 Q. So as I understand it, during a  
4 kick-off, was it you said a kick-off meeting?

5 A. We had kick-off town hall meetings.

6 There's a kick-off at the beginning of the year  
7 and then there's quarterly town hall meetings  
8 where the entire company gets together, either  
9 physically or on a webcast, and the president  
10 and CEO of the company would give you the  
11 position of the company and their initiatives  
12 and goals.13 Q. And it was during that town hall meeting  
14 that it was mentioned the company might be  
15 looking into acquiring?16 A. I should say the thought was just thrown  
17 out, like maybe, maybe not. It was a  
18 suggestion, but nothing definitely.19 Q. And it was also mentioned during finance  
20 meetings?21 A. Finance meetings had a little bit  
22 more -- I should say a little stronger in that  
23 it probably will happen. We don't know when  
24 and who it's going to be, but it's a strong  
25 possibility.

---

---

1

2 Q. When you first received an e-mail from  
3 Mr. -- allegedly from [REDACTED] referencing  
4 an acquisition, was it your impression that he  
5 had been talking about the purchase that was  
6 mentioned in the finance meetings?

7 A. I think that the general consensus or  
8 gossip around finance would be that I think the  
9 whole team was expecting that they were going  
10 to make a purchase of a company or, you know,  
11 either acquire a company or merge with one. So  
12 we were all kind of just waiting to hear the  
13 announcement of when it was going to happen or  
14 who and all the details.

15 So when that e-mail that I thought was  
16 from [REDACTED] came in, I didn't think  
17 anything untoward of it because I had already  
18 been anticipating it, so it didn't seem like,  
19 you know, wow.

20 Q. So in your mind the acquisition as  
21 referenced in the e-mail is this otherwise  
22 legitimate purchase that had been mentioned in  
23 finance?

24 A. Correct.

25 Q. And so in your mind, if I understand it,

---

---

1

2 when you were setting up the wire, it was your  
3 impression that you were funding this otherwise  
4 legitimate purchase that had been referenced in  
5 finance?

6 A. Yes.

7 Q. Let me show you what I'm going to mark  
8 as Exhibit 14.

9 (E-mail allegedly received from [REDACTED]  
10 [REDACTED] was marked as Defendant's Exhibit 14 for  
11 identification, as of this date.)

12 Q. This is a computer printout or probably  
13 a screen shot of an e-mail. Is Exhibit 14 a  
14 true and correct copy of the original e-mail  
15 you received allegedly from [REDACTED]?

16 MR. ZIFFER: Objection.

17 Objection. I didn't know if you were  
18 done. Sorry.

19 MR. SCHMOOKLER: I am done.

20 A. It looks to be. It looks to be one of  
21 the e-mails.

22 Q. Do you note at the bottom of the page  
23 there is no signature or no name typed. Just  
24 says best regards, and then there's like a  
25 button?

---

---

1

[REDACTED]

2 A. Yes.

3 Q. When you received the first e-mail from  
4 [REDACTED], was there a name typed at the  
5 bottom?

6 A. I don't recall. But if you were to  
7 click on those three dots basically it would  
8 just give you not your e-mail address, but it  
9 would just say your name, title and where you  
10 work, office location.

11 Q. Why do you say that?

12 A. Because that is what you would see if  
13 you were to click on those three dots. It just  
14 expands that information. So frequently I had  
15 gotten e-mails from various people that you  
16 would just see, you know, a salutation at the  
17 end and you didn't see the full amount of the  
18 e-mail because it just condenses it. But if  
19 you wanted to see you could actually click in  
20 there and expand the whole thing.

21 Q. Is it expansion or does the system add  
22 the names?

23 A. It expands. The system only adds what  
24 you set it up to add. So it's basically your  
25 signature. So if you want all that information

---

---

1

2 in there, whatever you want as your signature,  
3 you would set that up at the time when you set  
4 up your e-mail. And the system just collapses  
5 it just for space saving I would imagine.

6 Q. So you don't know when you saw the  
7 original e-mail allegedly from [REDACTED]  
8 whether it had his name at the bottom?

9 A. No, I don't know.

10 Q. Do you see in the second full paragraph  
11 it says I must bring up the fact that the  
12 operation is regulated by the financial market  
13 authority. Do you see that?

14 A. Yes.

15 Q. Do you know what that is?

16 A. No. It had sounded familiar. I knew it  
17 wasn't the SEC, which is for the U.S., and I  
18 had thought I had heard that this was for a  
19 foreign company, a foreign country, excuse me.  
20 Same type of governing body, but I wasn't sure.

21 Q. In the first sentence it says, in  
22 regards to an acquisition that we are currently  
23 undergoing, do you see that? Do you see the  
24 word acquisition?

25 A. Uh-huh.

---

---

1

[REDACTED]

2 Q. What was your understanding from of what  
3 this money was going to be used to do?

4 A. Well, acquisition is they are buying a  
5 company.

6 Q. Did you have a chance before the wire  
7 transfers went out to speak to [REDACTED]?

8 A. Before they went out, I walked over to  
9 him and asked him if he had received an e-mail  
10 from [REDACTED]. And he said that he did. And I  
11 said, okay, so I've already set up the wire  
12 according to what he said and it's waiting for  
13 his approval or release in Chase.

14 Q. Did he say anything else to you about  
15 the company buying another company?

16 A. No. What he did say was he asked me  
17 what it was for and I said, well, I don't have  
18 any more detail than he did. So then he  
19 replied that is it, what he thinks it is. Which  
20 I interpreted as the company buying another  
21 company. And I said, I think so as well. And  
22 so he said, okay, the amounts look about right  
23 or something like that. And that was it.

24 Q. So based on your conversation with  
25 [REDACTED], was it your mutual understanding at

---

---

1

2 that time that this money -- that the reason  
3 you were going forward with this transaction is  
4 because you both thought it was to fund a  
5 purchase that had been discussed within the  
6 company?

7 MR. ZIFFER: Objection.

8 THE WITNESS: Should I answer?

9 MR. ZIFFER: If you can.

10 A. I would just say that it was a mutual  
11 understanding that it was for an acquisition,  
12 but not any one in particular. That was,  
13 again, I mentioned previously that there was  
14 never a set confirmed information relayed to  
15 any of us that said we were going to be  
16 acquiring a company. It was always just a  
17 suggestion. So we assumed that this is what  
18 this was going to be for.

19 Q. Do you know if [REDACTED] was aware of any  
20 greater detail about the company acquiring  
21 another company?

22 A. No.

23 Q. Did you have any phone conversations  
24 with anyone prior to the wire transfer going  
25 out?

---

---

1

2 A. Yes, with the person that first  
3 contacted me through e-mail. He had called.  
4 Identified him himself. The first e-mail came  
5 through, which I thought it was from [REDACTED]  
6 [REDACTED], and stating that I would be in contact  
7 with some lawyer, I think he said a lawyer,  
8 about this. And that I should make myself  
9 available and give him whatever information he  
10 needs to make sure that this went through. And  
11 then shortly thereafter I received a phone  
12 call. That was first phone call that I  
13 received from this person. And basically just  
14 introduced himself and just -- I don't remember  
15 what else was said.

16 Q. In the first e-mail you received, which  
17 I've put in front of you, it says in the first  
18 full paragraph, "If you can please devote your  
19 full attention to his demand to acquire some  
20 accounting information so that we can finalize  
21 this deal." Do you see that?

22 A. Yes.

23 Q. At the time of the first e-mail were you  
24 aware that you were being asked to transfer  
25 money?

---

---

1

2 A. At this point, I don't recall if that  
3 crossed my mind, that I was going to -- I  
4 assumed that at some point somebody would wire  
5 the funds. It may not have been me. But only  
6 someone in accounts payable had authority to  
7 set up a wire. So for the people that had  
8 access to the bank portal, you would have  
9 someone to set it up and then someone to  
10 actually receive -- not receive, release and  
11 approve it. So the person couldn't be the  
12 same. You couldn't set it up and release. And  
13 so I knew that if it was going to be anyone it  
14 would probably be me as the [REDACTED].

15 But at this point I don't recall that I  
16 was thinking that was my thought, okay, I'm  
17 going to transfer some money.

18 Q. And I just want to take it kind of  
19 step-by-step. At the time you first received  
20 the first e-mail it was your understanding that  
21 you were going to be asked to provide some  
22 information, correct?

23 A. Correct.

24 Q. At this point, as of the first e-mail at  
25 11:12 a.m. you hadn't been asked or directed to

---

---

1

[REDACTED]

2 transfer any money, correct?

3 A. I guess. I don't recall the actual  
4 times but --

5 Q. It's on the e-mails.

6 A. Okay.

7 Q. I'm sorry. Let me show you this. This  
8 will be easier for this. This is Exhibit 12,  
9 is the e-mail chain. It has the time stamp.  
10 Again, looking at the first e-mail on Exhibit  
11 12, which is the original e-mail from the  
12 alleged [REDACTED], you see how it's 11:12?

13 A. Yes, uh-huh.

14 Q. So at the time of the first e-mail,  
15 11:12 a.m., you hadn't yet been directed or  
16 instructed to transfer any money, correct?

17 A. Correct.

18 Q. And after this e-mail you'll see what  
19 follows is a series of e-mails between you,  
20 [REDACTED] and a guy, somebody named Michael  
21 Meyer?

22 A. Correct.

23 Q. And the one at 11:52 --

24 A. Yes.

25 Q. You provide him your phone number. Do

=====

1

[REDACTED]

2 you see that, ma'am?

3 A. Yes.

4 Q. After you provided the alleged Michael  
5 Meyer with your phone number did you have a  
6 conversation with him?

7 A. Phone conversation. I would imagine. I  
8 don't recall, but there were quite a few calls  
9 from him. So makes sense that it was probably  
10 at that time he would have called me.  
11 Previously I think the prior calls went through  
12 the company directory, which is general number,  
13 and just asked to speak with me.

14 Q. Do you recall if the first mention of  
15 transferring money was over the phone during  
16 one of these phone conversations?

17 A. Yes, I think it was. I do believe he  
18 mentioned that it would have to be some sort of  
19 transfer of funds and then I went on to explain  
20 to him that I would need that in an e-mail from  
21 [REDACTED] and not from him.

22 Q. So, from a chronology perspective, the  
23 first mention of wire transferring money was in  
24 a phone call which was then followed up with an  
25 e-mail?

---

---

1

[REDACTED]

2 A. Yeah, I believe so.

3 Q. And did you want it in e-mail so you  
4 could document your file?

5 A. Yes. So what we would need is if we  
6 made any kind of cash disbursement of any sort  
7 and we didn't have an invoice to pay against  
8 that was actually signed, we could accept  
9 someone's -- or even if we did have an invoice  
10 or something, we could accept someone's e-mail  
11 as approval rather than a physical signature.

12 Q. If you look at page 329, I'm using the  
13 Bates numbers. It says in the 1:32 p.m.  
14 e-mail, you provide some banking information.  
15 And then you say, "I can cut a manual check and  
16 deliver it to [REDACTED] to sign off on in  
17 order to maintain confidentiality. I can, if  
18 necessary, deliver a blank check from Silicon  
19 Valley bank to [REDACTED] and he can write the check  
20 himself. Do you see that?

21 A. Yes.

22 Q. Why is it that you ultimately went  
23 forward with a wire transfer instead of issuing  
24 a check?

25 A. Because the person said a check would

---

---

1

[REDACTED]

2 not work.

3 Q. Did he explain why the check would not  
4 work?

5 A. He said it was overseas and I needed to  
6 make sure the transaction went through. It was  
7 time sensitive and a check would take some time  
8 to clear.

9 Q. The next e-mail you write, "I believe  
10 that if [REDACTED] sent along a request via e-mail  
11 with a request to process a wire transaction  
12 for a bogus reason, they would not ask  
13 questions at this time."

14 Do you see that?

15 A. Yes, uh-huh.

16 Q. What do you mean by bogus reason?

17 A. So they would just allude to -- you  
18 didn't have to give the exact reason or reason  
19 with full detail. Just authorizing that this  
20 transaction needed to be made, certainly not  
21 just saying okay pay this money and that's  
22 that. But just they would need to have some  
23 reason. Whether it was a real reason or not,  
24 they would need a reason in order to actually  
25 release any sort of funds from the bank.

---

---

1

[REDACTED]

2 moment. On the first page, 327 --

3 A. Uh-huh.

4 Q. -- do you see how your e-mail to

5 [REDACTED], it went to secureop@dr.com?

6 A. Yes, uh-huh.

7 Q. That's not a Medidata e-mail, correct?

8 A. Correct.

9 Q. Did you type [REDACTED]' e-mail in  
10 when you sent back this e-mail or did you just  
11 hit reply?

12 A. I just hit reply.

13 Q. Had you ever had any e-mail  
14 correspondence with [REDACTED] prior to  
15 September 16th?

16 A. Yes. As I mentioned before, I used to  
17 process all of the travel and entertainment  
18 expenses. So if there was a question that I  
19 might have had or if there was an incident  
20 where I had rejected an expense he put through  
21 then I would have -- he would get an automatic  
22 e-mail from the system. And then if he got the  
23 e-mail before his admin then he would have  
24 answered the e-mail or asked the question or  
25 replied.

---

---

1

[REDACTED]

2 Q. Was there a second request for a wire  
3 transfer?

4 A. Yes.

5 Q. And did that one go through?

6 A. No.

7 Q. And that one didn't go through because  
8 ultimately [REDACTED] didn't approve the wire  
9 transfer?

10 A. Correct.

11 Q. So is it fair to say then that under  
12 Medidata's systems, even though an e-mail came  
13 in and wire transfer was set up, [REDACTED]  
14 approval was ultimately necessary for the money  
15 to go out?

16 MR. ZIFFER: Objection.

17 A. It just needed to have two authorized  
18 signatories. He just happened to be one of  
19 them at the time, but it could have been any  
20 other two.

21 Q. Fair enough. So is it fair to say then  
22 under Medidata's systems that despite an e-mail  
23 requesting a wire and you setting up the wire,  
24 unless and until two authorized signers signed  
25 into the Chase system and approved the wire no

---

---

1

2 money would go out?

3 A. Correct.

4 Q. Did you speak with [REDACTED] about  
5 the wire transfer before he approved it?

6 A. Yes. He actually came over to me I  
7 think on the -- I don't remember what day it  
8 was, but when we set up the first wire. When I  
9 set up the first wire and we had gotten the  
10 e-mails. I think at that time the person --  
11 well, [REDACTED], who we thought was [REDACTED], had sent  
12 out an e-mail to [REDACTED] and [REDACTED], and I think  
13 when they were in receipt of that e-mail [REDACTED]  
14 was the first one to walk over and just ask me  
15 if I had gotten that e-mail. And I said yes  
16 and he said okay.

17 Q. Did you at the time [REDACTED] walked  
18 over, show him any of the other e-mails you had  
19 received from the alleged [REDACTED]?

20 A. No. He actually didn't come all the way  
21 to my desk. He kind of was a few feet away.  
22 He just kind of called out to me and asked if I  
23 had gotten those e-mails from [REDACTED] and I said,  
24 yes, and he said okay. And then he just walked  
25 back to his seat.

---

---

1

[REDACTED]

2 (A communication from [REDACTED] to [REDACTED]  
3 [REDACTED] was marked as Defendant's Exhibit 15  
4 for identification, as of this date.)

5 Q. Let me show you show you what I'm  
6 marking as Exhibit 15. Do you know what this  
7 is?

8 A. Yes. So basically I was sending it, it  
9 looks like it must have been to [REDACTED]. Asking  
10 him -- so we must have gotten, I must have  
11 gotten some type of I don't know if it was an  
12 e-mail or phone call from the person, Michael  
13 Meyer, saying -- asking if it was processed.  
14 If the wire had gone through. And so I had  
15 reached out to [REDACTED] and told him when he's  
16 done, because at that point he probably had  
17 come to me first before [REDACTED].

18 And so he was probably in my mind would  
19 have gotten to the bank portal and approved it  
20 first and then the second person would actually  
21 release it. And so I was just letting him know  
22 that once he did his part, which is approve the  
23 wire, let [REDACTED] know so he can go in and release  
24 it.

25 Q. Is this Exhibit 15 an e-mail or is it an

---

---

1

[REDACTED]

2           All of the information input to set up  
3       the wire transfer you input, correct?

4   A.       Yes.

5   Q.       And you would have manually input all of  
6       the wire transfer information into the Chase  
7       system, correct?

8   A.       Correct.

9   Q.       And at the time you input manually the  
10       wire transfer information you believed that  
11       this was a legitimate transaction, did you not?

12   A.       Correct.

13   Q.       And did anyone at the company -- strike  
14       that.

15           How did you first learn that you were  
16       being approved to set up wires in the Chase  
17       system?

18   A.       When I took on the position as [REDACTED]  
19       [REDACTED] and we rolled out -- well, for wire  
20       transactions, yes, when I took on the position  
21       to be [REDACTED].

22   Q.       Did someone explain to you at that time  
23       what your duties and responsibilities were?

24   A.       No, just basically showed me how to set  
25       up the wires in the system using existing

---

---

1

[REDACTED]

2           There was no way for anyone without the  
3       fob to enter into the Chase system, correct?

4           MR. ZIFFER: Objection.

5       A.       True.

6       Q.       And in connection with the wire on  
7       September 16, you would have in order to -- you  
8       did in order to initiate the wire, use your own  
9       user name, user password and your fob, correct?

10      A.       Correct.

11      Q.       Did you ultimately speak with  
12       [REDACTED] about these wire transfers?

13      A.       Not initially. No, not in person.

14      Q.       At any point did you?

15      A.       Yes. This was after the first wire had  
16       gone out and there was a request for a second  
17       wire and at that point I thought that this was  
18       going to be -- the initial request for the wire  
19       funds seemed low so I assumed it was going to  
20       be a few transactions. And so when the second  
21       request came in it wasn't surprising to me.

22      And so the conversation with [REDACTED] only occurred  
23       after [REDACTED] had saw the e-mail. The reply to  
24       e-mail is one that he didn't recognize. And he  
25       mentioned that and I said, okay, so now we need

---

---

1

2 to just go upstairs and see if [REDACTED] is in the  
3 office and if he is then we will just ask him  
4 and if he's, you know.

5 At that point we were worried and so we  
6 decided that if we disturbed him or interrupted  
7 one of his meetings then we were just going to  
8 do it and just find out just to be sure. So  
9 that's when we -- I had sent an e-mail. And I  
10 did not reply to. I instigated and initiated  
11 the e-mail from my own e-mail address. And I  
12 had asked him, hey, have you been having any  
13 sort of sending me e-mails in the past couple  
14 of days in regards to an acquisition. And then  
15 he replied no and that's when I went upstairs  
16 to speak with him.

17 Q. At the time you first logged in to the  
18 Chase system on September 16, you did so  
19 because that was the only way for you to  
20 initiate a wire transfer, correct?

21 A. Correct.

22 Q. You understood at the time that as you  
23 entered information into the Chase system that  
24 you were in fact initiating a wire transfer,  
25 correct?

---

---

1

[REDACTED]

2 A. Correct.

3 Q. And you understood, did you not, that  
4 when you pushed the submit button that that  
5 would make the wire transfer you had initiated  
6 available for the authorized signers to review,  
7 correct?

8 A. Correct.

9 Q. And as you were going through that  
10 process, the input of information and pushing  
11 the submit, it was your impressions at that  
12 time that you were doing so to fund this  
13 alleged purchase?

14 A. Correct.

15 MR. SCHMOOKLER: Let's take a  
16 few minute break. We've been going more  
17 than an hour. I try to offer a break in  
18 an hour.

19 THE VIDEOGRAPHER: Going off  
20 record at 2:41 p.m.

21 (A recess was taken.)

22 THE VIDEOGRAPHER: We're back on  
23 record at 2:47 p.m. You may proceed.

24 BY MR. SCHMOOKLER:

25 Q. Let me show you what I have marked as

=====

1

2 Exhibit 6. Have you ever seen this? This is a  
3 printout from a computer screen. Have you ever  
4 seen this information before?

5 A. Yes, this is basically like an audit  
6 trail that you can get from Chase showing what  
7 transacted and the time and the date stamp on  
8 it.

9 Q. And so am I reading this correctly then  
10 that there was roughly 34 minutes between the  
11 time you first input the wire transfer to the  
12 time it actually went out the bank?

13 A. Yes.

14 Q. And so comparing that, you know, from a  
15 timing perspective, the e-mail you originally  
16 received which is Exhibit 12 was at 11:12 a.m.?

17 A. Uh-huh, yes.

18 Q. So it took, am I reading this correctly  
19 then, more than four hours for all of this, all  
20 of these discussions to occur and the wire  
21 transfer to ultimately go out?

22 A. Correct.

23 Q. Let me show you what I've marked as  
24 Exhibit 16.

25 (Printout of the wire transmittal was

1

2 marked as Defendant's Exhibit 16 for  
3 identification, as of this date.)

4 Q. Have you seen this before, ma'am?

5 A. Yes.

6 Q. What is Exhibit 16?

7 A. This is the actual printout, if you  
8 will, of the wire transfer.

9 Q. Do you see the section called payment  
10 information?

11 A. Yes.

12 Q. Did you input all of the information in  
13 the payment information box?

14 A. Some of those areas, like our account  
15 information, would have been already  
16 pre-populated. You just needed to select which  
17 account you wanted to pay from and it would  
18 autopopulate the rest of the information. The  
19 actual amount of wire had to be entered each  
20 time and bank references generated from the  
21 system.

22 Q. How about in the beneficiary box, did  
23 you have to enter all of that information?

24 A. Yes.

25 Q. And how about in the beneficiary bank

---

---

1

[REDACTED]

2 box, did you have to enter all of that  
3 information?

4 A. Yes.

5 Q. So when you went into the system you  
6 would have had to manually enter the  
7 beneficiary ID, correct?

8 A. Correct.

9 Q. And when you went into the Chase system  
10 you would have had to manually enter the name  
11 of the beneficiary, correct?

12 A. Correct.

13 Q. And when you went into the Chase system  
14 you would have had to manually enter the  
15 payment amount, correct?

16 A. Correct.

17 Q. And when you went into the Chase system  
18 you would have had to enter the bank ID for the  
19 beneficiary bank, correct?

20 A. Correct.

21 Q. When you went into the Chase system did  
22 you have to manually enter the bank name?

23 A. No. I don't recall if I had to do it  
24 for this instance, but it's not always  
25 necessary. The bank has a module to recognize

=====

1

2 different banking IDs of other banks and so it  
3 would auto populate the name of the bank and  
4 address, country.

5 Q. When did you stop working at Medidata?

6 A. I believe it was the end of October of  
7 2014.

8 Q. Did they terminate you, ma'am?

9 A. Yes.

10 Q. Did they explain to you why you're being  
11 terminated?

12 A. Yes. So after an investigation, and  
13 they explained that the board had decided that  
14 although I was found to be not at fault of any  
15 malicious behavior, that had to have some sort  
16 of remediation and this is what they call  
17 fraud, that everyone that was involved. This  
18 is what I was told, that everyone that was  
19 involved directly with the wire fraud incident  
20 would need to be terminated, and so on that  
21 same day myself, as well as [REDACTED] was  
22 terminated. [REDACTED] was not terminated.

23 Q. Who did you meet with at the time of  
24 your termination?

25 A. Eileen Schloss, which is the head of HR

---

---

1

[REDACTED]

2 it's also cross.

3 MR. SCHMOOKLER: Depends on how  
4 it's used ultimately.5 Q. Going back to my prior question. You  
6 said that in your conversation with the  
7 individual who purported to be Attorney Meyers  
8 (sic), you needed additional details regarding  
9 the beneficiary of the wire that was being  
10 requested, correct?

11 A. Correct.

12 Q. Did you need something else before you  
13 would be willing to set up the wire that was  
14 being requested?15 A. Yes, I need the request to come from  
16 [REDACTED].17 Q. And does Exhibit 13 reflect what you  
18 were seeking in that conversation?19 A. That, no. That is just a partial. That  
20 is the -- just the beneficiary details of where  
21 the wire is going to be sent. But I was asking  
22 that I would need to have [REDACTED] contact  
23 me and tell me to make this payment.24 Q. And did you receive that communication,  
25 as well?

---

---

1

[REDACTED]

2 A. Yes, through e-mail.

3 Q. And looking at Exhibit 13, what about  
4 the e-mail indicated to you that it came from  
5 [REDACTED]?

6 A. Excuse me? I don't understand.

7 Q. What about -- what information on the  
8 page that is Exhibit 13 made you believe that  
9 it came from [REDACTED]?

10 A. Okay, the e-mail address.

11 Q. And can you read to me the e-mail  
12 address that you're looking at when you  
13 reference that?

14 A. It has a picture of [REDACTED], and  
15 it has his name, [REDACTED], and then the  
16 e-mail address is listed as [REDACTED].

17 Q. And whenever you received the prior  
18 e-mails from [REDACTED] that you discussed in  
19 connection with your work in the [REDACTED],  
20 the e-mails had the same appearance with his  
21 picture, his name and e-mail address.

22 A. Well, it had the same e-mail address.  
23 The picture wasn't there. Again, we used a  
24 different e-mail, but yes, the e-mail looked  
25 the same.

---

---

A	60:5 <b>add</b> 27:21,24 <b>added</b> 16:11 <b>additional</b> 64:8 <b>address</b> 27:8 50:11 55:4 65:10,12,16,21 65:22 67:23 72:12,13 <b>adds</b> 27:23 56:14 <b>adjacent</b> 66:2 <b>admin</b> 41:23 <b>administer</b> 3:15 <b>advise</b> 16:18 <b>aforesaid</b> 74:10 <b>afternoon</b> 5:8 60:4 68:12 <b>AGREED</b> 3:3,8 3:12 <b>agreement</b> 56:11 56:15 62:16 73:16 <b>ahead</b> 7:14 1:17 4:12 71:15 72:21 73:4 74:9 75:5 75:20 <b>alleged</b> 33:12 34:4 37:2 40:7 43:19 51:13 <b>allegedly</b> 21:6 25:3 26:9,15 28:7 40:11 71:9 73:11 <b>Allentown</b> 4:6 <b>allude</b> 36:17 <b>alter</b> 63:12 <b>amount</b> 15:7 20:9 27:17 46:2 53:19 54:15 66:15 <b>amounts</b> 29:22 <b>announcement</b> 25:13 <b>anonymous</b> 39:4 <b>anonymously</b> 39:7 <b>answer</b> 5:20 6:4 6:6,10,19,21	7:13,14,19 20:18 30:8 <b>answered</b> 41:24 <b>answers</b> 6:16 <b>anticipate</b> 6:3,5 <b>anticipating</b> 25:18 <b>anybody</b> 63:22 <b>anymore</b> 22:4 ■ 11:19 17:21 23:6 47:18,21 <b>apologize</b> 19:13 <b>app</b> 17:17 <b>appear</b> 56:19 <b>appearance</b> 65:20 <b>appeared</b> 14:15 <b>appears</b> 58:2 60:12 <b>application</b> 18:4 <b>apply</b> 12:11 68:20 <b>appropriate</b> 22:20 68:25 <b>approval</b> 16:24 29:13 35:11 42:14 59:12,15 <b>approve</b> 11:16 12:5,25 18:11 18:19 20:15 21:14 22:13 32:11 42:8 44:22 45:8,13 45:20 59:22 <b>approved</b> 18:14 19:2 22:12 23:23 42:25 43:5 44:19 46:11 47:16 59:18 60:22 61:4 <b>areas</b> 53:14 <b>arises</b> 21:6 <b>asked</b> 7:7 29:9 29:16 31:24 32:21,25 34:13 41:24 43:22 45:7 50:12 66:9,10 <b>asking</b> 6:6,24	7:3,5 21:4 37:13 44:9,13 58:16 64:21 <b>assigned</b> 17:7 18:14 59:12 <b>assistant</b> 16:10 46:19 <b>assume</b> 7:6 <b>assumed</b> 30:17 32:4 49:19 <b>attached</b> 67:24 <b>attend</b> 63:4,8 <b>attention</b> 31:19 <b>attorney</b> 3:18 7:10 61:14 64:7 <b>attorneys</b> 2:4,10 3:4 <b>audit</b> 52:5 <b>Auditing</b> 8:12 <b>authority</b> 18:10 20:4,7 21:12 28:13 32:6 62:4 68:9,14 68:25 69:9 70:12,25 71:5 <b>authorization</b> 68:18 <b>authorize</b> 59:23 62:5 69:2 70:12 <b>authorized</b> 3:14 11:12,15,23 12:2,7,24 13:4 15:14,18 16:5 16:19 20:25 39:15 42:17,24 46:15 51:6 <b>authorizers</b> 19:2 <b>authorizing</b> 36:19 <b>auto</b> 55:3 <b>automated</b> 48:24 <b>automatic</b> 41:21 <b>automatically</b> 16:22 <b>autopopulate</b> 53:18 <b>available</b> 23:20	31:9 45:10,17 51:6 <b>avoid</b> 38:20 <b>aware</b> 22:25 30:19 31:24 <b>a.m</b> 32:25 33:15 52:16
				<b>B</b> <b>B</b> 73:8 <b>back</b> 40:25 41:10 43:25 51:22 60:10 62:10 63:25 64:5 71:18 72:4 <b>background</b> 7:23 <b>bank</b> 11:6,7,13 11:20,22,24 12:3,4,8,20,23 13:13,14,17 17:5 18:15 19:2 20:25 32:8 35:19 36:25 37:25 39:14 44:19 45:16,25 46:2 48:3 52:12 53:20,25 54:18 54:19,22,25 55:3 59:23 67:4 <b>banking</b> 35:14 55:2 <b>banks</b> 13:18 48:4 55:2 <b>bank's</b> 13:11 <b>based</b> 29:24 <b>basic</b> 38:15 <b>basically</b> 10:5,16 11:5,18 17:19 27:7,24 31:13 37:8 38:20 44:8 47:24 52:5 <b>batch</b> 11:5 12:15 12:18 38:7 <b>Bates</b> 19:23,23 35:13

<b>Battery</b> 1:19 4:10	71:2,6	38:19 39:22,23 <b>checks</b> 40:22 <b>Chicago</b> 2:12 [REDACTED] 29:7,25 <b>call</b> 31:12,12 34:24 37:22 44:12 55:16 <b>called</b> 5:10 19:23 23:19 31:3 34:10 43:22 53:9 <b>calls</b> 34:8,11 <b>capacity</b> 65:19 <b>career</b> 8:10 <b>case</b> 16:24 75:3 <b>cash</b> 35:6 45:14 <b>cause</b> 61:21 <b>CEO</b> 20:12,15 20:24 21:16 24:10 46:6 <b>certain</b> 21:24 37:11 45:25 <b>certainly</b> 36:20 <b>certification</b> 3:6 <b>certify</b> 74:8,16 <b>CFO</b> 16:9 20:11 20:14,23 45:13 46:6 <b>chain</b> 33:9 <b>chairman</b> 16:9 21:16 <b>chance</b> 29:6 <b>change</b> 71:22 75:6 <b>changes</b> 14:3,8 71:21 72:3 <b>charge</b> 3:18 <b>Chase</b> 13:17,19 13:20,22,25 14:2,5,18,21 15:15 16:22 29:13 37:20,22 42:25 47:6,16 48:5,18 49:3 50:18,23 52:6 54:9,13,17,21 <b>chat</b> 45:6 <b>check</b> 10:22 35:15,18,19,24 35:25 36:3,7	34:12 39:5 47:13 60:16,24 61:24 63:18 70:12,14,20,24 71:2,7,10 <b>comparing</b> 52:14 <b>computer</b> 17:11 26:12 45:5 52:3 69:13 70:2 <b>concludes</b> 71:15 <b>condenses</b> 27:18 <b>conduct</b> 9:21 <b>confidential</b> 23:22 <b>confidentiality</b> 35:17 <b>confirmation</b> 37:13 <b>confirmed</b> 30:14 <b>confuse</b> 7:2 <b>connection</b> 49:6 65:19 <b>consensus</b> 25:7 <b>consistent</b> 61:17 <b>contact</b> 31:6 37:20 64:22 <b>contacted</b> 31:3 <b>contains</b> 40:17 <b>CONTINUED</b> 70:6 <b>contractor</b> 9:16 <b>control</b> 18:24 <b>controller</b> 16:10 16:11 46:19 <b>convenient</b> 63:11 <b>conversation</b> 6:2 29:24 34:6,7 40:21 49:22 64:6,18 <b>conversations</b> 30:23 34:16 37:6 38:16 70:23 71:5 <b>cooperation</b> 62:15 <b>copy</b> 3:17 26:14 57:6 66:3,4	<b>corner</b> 19:21 <b>correct</b> 11:17 12:10,12 13:17 14:2,16,18,19 15:22,23 25:24 26:14 32:22,23 33:2,16,17,22 40:19 41:7,8 42:10 43:3 47:3,7,8,12 49:3,9,10 50:20,21,25 51:2,7,8,14 52:22 54:7,8 54:11,12,15,16 54:19,20 59:2 60:13,14,24,25 61:5,6,14,15 61:18,19,22,23 62:6,7 63:5,6,9 63:18,19,23,24 64:10,11 67:2 67:7,20,21,25 68:4,5,11,18 68:19 69:4,10 69:11,14,17,24 71:11 <b>correctly</b> 10:17 52:9,18 <b>correspondence</b> 41:14 <b>cost</b> 8:12 <b>counsel</b> 61:3,12 66:9 70:10 <b>Counselor</b> 58:6 <b>counsels</b> 4:16 <b>countries</b> 37:11 38:8 <b>country</b> 28:19 55:4 <b>couple</b> 16:11 50:13 70:8 <b>course</b> 21:23 68:7 <b>courses</b> 8:9,14 8:15,18,20,22 8:23 <b>coursework</b> 8:12 <b>court</b> 1:1 3:17 4:15,23 5:23
-----------------------------	--------	--	---	--

6:7,12,15,19 71:24 72:7,11	69:9,15,22 70:18 71:8 73:12	55:19 <b>director</b> 16:13 <b>directory</b> 34:12 <b>disbursement</b> 35:6	70:17 72:11,12 <b>electronic</b> 10:23 10:25 11:2,3 37:9 38:5 <b>electronically</b> 11:6 12:20 <b>disbursements</b> 12:12 18:11 45:14	56:1 57:1,20 58:1 59:1 60:1 60:4 61:1 62:1 62:19 63:1 64:1 65:1 66:1 67:1,8 68:1 69:1 70:1 71:1 71:16,20 72:1 72:21 73:4,13 74:9 75:5,20
<b>courtesy</b> 6:11 <b>coverage</b> 5:11 60:7 <b>CPE</b> 8:9 <b>CRCC</b> 4:6,24 <b>create</b> 14:23,24 14:25 15:3 <b>credentials</b> 17:18 45:24 <b>crediting</b> 15:5 <b>cross</b> 64:2 <b>crossed</b> 32:3 <b>cumulatively</b> 68:6 <b>current</b> 8:23 <b>currently</b> 9:7 28:22 <b>cut</b> 35:15 <b>cycle</b> 22:10,11 59:20	<b>deal</b> 31:21 <b>debiting</b> 15:5 <b>December</b> 9:12 <b>decided</b> 23:18 50:6 55:13 <b>decision</b> 72:8 <b>defendant</b> 1:10 1:17 2:10 4:20 60:7 63:18 <b>Defendant's</b> 26:10 44:3 53:2 56:12 73:10 <b>definitely</b> 24:18 <b>deliver</b> 35:16,18 <b>demand</b> 31:19 <b>departed</b> 60:16 <b>Depends</b> 64:3 <b>deposition</b> 1:16 3:13 4:8 5:12 5:14,17,23 63:5,8 71:15 75:4 <b>Design</b> 7:24 <b>designee's</b> 59:12 <b>desk</b> 43:21 <b>desktop</b> 17:17 18:3 <b>despite</b> 42:22 <b>detail</b> 29:18 30:20 36:19 <b>details</b> 25:14 37:7 61:25 62:2 64:8,20 <b>development</b> 70:9 <b>devote</b> 31:18 <b>different</b> 8:10,12 8:13 21:4 38:5 48:3 55:2 57:23 58:3,8 65:24 <b>direct</b> 21:12 66:9 70:18,25 71:9 <b>directed</b> 32:25 33:15 <b>directly</b> 37:18	<b>discuss</b> 37:2 46:20 <b>discussed</b> 30:5 38:25 61:3 62:6 65:18 <b>discussing</b> 39:18 60:9 61:18 68:13 <b>discussion</b> 38:12 38:22 <b>discussions</b> 52:20 61:12,20 63:3,7,21 <b>District</b> 1:1,2 4:14,15 <b>disturbed</b> 50:6 <b>document</b> 18:13 18:24 35:4 58:20 60:10 70:11 <b>doing</b> 48:2 51:12 <b>dollar</b> 15:7 21:3 <b>dots</b> 27:7,13 <b>duly</b> 5:3 74:11 <b>duties</b> 47:23	<b>employed</b> 9:13 <b>employee</b> 9:19 9:25 17:7 18:9 <b>employment</b> 8:23 56:23 <b>empty</b> 37:10 <b>engaged</b> 56:4 <b>enter</b> 13:24 49:3 53:23 54:2,6 54:10,14,18,22 <b>entered</b> 10:17,19 15:7 50:23 53:19 56:16 <b>District</b> 1:1,2 4:14,15 <b>disturbed</b> 50:6 <b>document</b> 18:13 18:24 35:4 58:20 60:10 70:11 <b>doing</b> 48:2 51:12 <b>dollar</b> 15:7 21:3 <b>dots</b> 27:7,13 <b>duly</b> 5:3 74:11 <b>duties</b> 47:23	<b>entertainment</b> 10:5 41:17 <b>entire</b> 24:8 <b>entirety</b> 12:18 <b>entitled</b> 7:12 <b>entries</b> 66:10 <b>equivalent</b> 13:6 <b>ESQ</b> 2:6,13 <b>essentially</b> 5:17 ████████ 1:17 4:12 5:8 6:1 7:1 8:1 9:1 10:1 11:1 12:1 13:1 14:1 15:1 16:1 17:1 18:1 19:1 20:1 21:1 22:1 23:1 24:1 25:1 26:1 27:1 28:1 29:1 30:1 31:1 32:1 33:1 34:1 35:1 36:1 37:1 38:1 39:1 40:1 41:1 42:1 43:1 44:1 44:2 45:1 46:1 47:1 48:1 49:1 50:1 51:1 52:1 53:1 54:1 55:1
			<b>E</b> <b>E</b> 2:1,1,16,16 5:2 10:2,3 73:1,8 74:1,1 75:1,1,1 <b>earlier</b> 58:13 68:12 <b>easier</b> 19:12 33:8 <b>easiest</b> 6:11 <b>educational</b> 7:23 <b>effect</b> 3:16 39:18 <b>effort</b> 60:6 <b>Eileen</b> 55:25 56:7 <b>either</b> 16:25 24:8 25:11 58:3	<b>exhibits</b> 19:4 67:9,19,22 68:3,6 69:22 69:25 73:10 <b>existing</b> 47:25 <b>expand</b> 27:20 <b>expands</b> 27:14 27:23 <b>expansion</b> 27:21 <b>expecting</b> 25:9 <b>expedite</b> 37:9 <b>expenditure</b> 18:20 21:12,15

<b>expenditures</b>	<b>F</b>	49:15 50:17 52:11 <b>floor</b> 21:21 <b>fob</b> 14:6,15 15:21 48:7,19 49:3,9 <b>followed</b> 34:24 59:15 <b>follows</b> 5:5 33:19 <b>force</b> 3:15 <b>foreign</b> 28:19,19 <b>form</b> 3:9 37:15 38:2,5 62:8,13 <b>forms</b> 10:18,18 37:12,17 <b>forward</b> 30:3 35:23 <b>feet</b> 43:21 <b>felt</b> 62:4 <b>file</b> 35:4 <b>filings</b> 3:5 <b>filled</b> 10:19 <b>final</b> 56:19 57:6 <b>finalize</b> 31:20 <b>Finally</b> 7:9 <b>finance</b> 16:12,14 23:16 24:19,21 25:6,8,23 26:5 59:11 <b>financial</b> 28:12 59:19 <b>find</b> 13:22 16:20 17:2 19:6 37:8 38:17 50:8 <b>fine</b> 37:19 <b>finish</b> 6:9 <b>finished</b> 16:17 <b>firm</b> 56:6,9,9 63:22 <b>first</b> 5:3 9:13,24 11:9 17:6 21:9 25:2 27:3 28:21 31:2,4 31:12,16,17,23 32:19,20,24 33:10,14 34:14 34:23 41:2 43:8,9,14 44:17,20 45:25 47:15 48:15	<b>gather</b> 5:18 [REDACTED] 65:16 <b>general</b> 25:7 34:12 <b>generate</b> 39:6 <b>generated</b> 53:20 <b>gestures</b> 6:17 <b>getting</b> 23:23 <b>gist</b> 38:15 <b>give</b> 7:22 24:10 27:8 31:9 36:18 57:20 72:11 <b>given</b> 62:15 <b>gives</b> 14:2 <b>giving</b> 61:24 [REDACTED] 21:7 25:16 26:9,15 29:10 31:5 33:12 34:21 35:16,19 36:10 40:7 43:11,11,19,23 49:22 50:2 64:16,22 65:14 65:15 73:12 <b>Gmail</b> 17:24 18:3,6 <b>go</b> 7:14 11:18,19 12:4,8,24,25 13:10,12,15,21 14:13,23 15:20 16:20 17:4,16 19:5 23:24 39:9 42:5,7,15 43:2 44:23 50:2 52:21 62:20 71:18 72:12 <b>goals</b> 24:12 <b>goes</b> 37:10 <b>going</b> 5:19 7:6 11:7 21:3 24:24 25:9,13 26:7 29:3 30:3 30:15,18,24 32:3,13,17,21 39:13,14,21 49:18,19 50:7 51:9,16,19	62:19 63:25 64:5,21 <b>Good</b> 5:8 60:4 <b>Google</b> 17:15 <b>Gordon</b> 1:19 2:10 4:9 <b>gossip</b> 25:8 <b>gotten</b> 27:15 43:9,15,23 44:10,11,19 <b>governing</b> 28:20 <b>graduate</b> 8:3 <b>Graphic</b> 7:24 <b>greater</b> 30:20 <b>ground</b> 5:22 <b>guess</b> 6:25 33:3 58:14 <b>guy</b> 33:20
<b>H</b>				
<b>H</b>				

hour 51:17,18	52:4 53:10,12	involved 5:11	28:15 30:19	24:15 33:10
hours 52:19	53:13,15,18,23	11:9 22:16,25	39:6 44:6,11	65:3,12
<b>HR</b> 55:25	54:3 65:7	23:4 39:8	44:21,23 45:3	<b>looks</b> 26:20,20
	66:16,22,24	55:17,19 68:22	48:13 50:4	44:9 45:4
<b>I</b>	67:3,6	69:3	52:14 56:22	56:17 60:18
icon 18:2	<b>initial</b> 38:12	<b>involving</b> 5:11	66:3 67:10	<b>loss</b> 60:7
<b>ID</b> 13:25 14:4,8	48:14 49:18	<b>issue</b> 21:25	<b>knowledge</b>	<b>lots</b> 23:9
14:14 15:21	<b>initially</b> 45:24	<b>issued</b> 48:6	60:23	<b>low</b> 49:19
48:7 54:7,18	48:3 49:13	63:17	<b>known</b> 46:5	<b>lower</b> 19:21
<b>identification</b>	<b>initials</b> 56:18	<b>issuing</b> 11:10	<b>Kong</b> 37:12	
26:11 44:4	<b>initiate</b> 49:8	35:23		<b>M</b>
53:3 56:12	50:20	<b>items</b> 66:14		mail 17:15
73:10	<b>initiated</b> 50:10			<b>maintain</b> 35:17
<b>identified</b> 18:10	51:5			<b>major</b> 7:25
31:4	<b>initiating</b> 50:24			<b>making</b> 10:16
<b>identify</b> 4:17	<b>initiatives</b> 24:11			<b>malicious</b> 55:15
19:24	<b>input</b> 46:24 47:2			56:4
<b>identifying</b> 14:6	47:3,5,9 51:10			
14:9	52:11 53:12			9:10
<b>IDs</b> 55:2	<b>instance</b> 54:24			10:13,15,22
<b>Illinois</b> 2:12	<b>Instant</b> 45:2,5			11:11 16:14,15
<b>imagine</b> 28:5	<b>instigated</b> 50:10			23:6 32:14
34:7	<b>instructed</b> 33:16			45:12 47:19,21
<b>immediate</b> 38:20	<b>instructions</b>			56:2
<b>implementing</b>	62:3			<b>manual</b> 35:15
10:23	<b>insufficient</b>			58:18,25
<b>impression</b> 25:4	61:21			<b>manually</b> 47:5,9
26:3	<b>insurance</b> 1:9			54:6,10,14,22
<b>impressions</b>	4:13 5:9,10			66:11,23 67:4
51:11	60:6 63:18			<b>mark</b> 26:7
<b>incident</b> 41:19	75:3			<b>marked</b> 19:4,16
55:19	<b>Insuring</b> 10:20			19:18 26:10
<b>incomplete</b> 58:3	<b>interested</b> 74:18			40:9 44:3
<b>indicate</b> 18:19	<b>International</b>			51:25 52:23
<b>indicated</b> 65:4	22:7			53:2 56:11,14
68:12 69:8	<b>Internet</b> 13:15			<b>market</b> 28:12
70:17	13:21			<b>marking</b> 44:6
<b>individual</b> 38:9	<b>interpose</b> 7:10			<b>marriage</b> 74:18
61:13 64:7	<b>interpreted</b>			<b>matter</b> 4:12
<b>individually</b>	29:20			74:19
11:7	<b>interrupted</b> 50:6			<b>ma'am</b> 20:4 34:2
<b>information</b>				40:13 53:4
5:19 15:3,6,8				55:8
18:5 23:25				<b>mean</b> 36:16
27:14,25 30:14				<b>MED</b> 57:18
31:9,20 32:22				58:17,17,21
35:14 37:21,25				60:12
40:18 46:5,24				<b>Medidata</b> 1:4
47:2,6,10				4:12,22 5:12
50:23 51:10				8:21 9:3,4,14
				9:19,25 11:10

11:13 12:15	<b>money</b> 11:25	21:14 23:17,20	<b>obviously</b> 38:17	<b>P</b>
16:6 17:7,23	12:6 29:3 30:2	36:5,20 42:17	<b>occasional</b> 22:9	<b>P</b> 2:1,1,16 3:1
18:9 21:23	31:25 32:17	53:16 61:23	<b>occur</b> 38:24	<b>packet</b> 19:8
22:20,25 41:7	33:2,16 34:15	62:3,3 64:8	52:20	<b>page</b> 19:24 20:3
55:5 56:16	34:23 36:21	<b>needs</b> 31:10	<b>occurred</b> 49:22	26:22 35:12
59:16 60:5	38:9,23 40:22	<b>never</b> 18:12 20:9	<b>October</b> 9:5,6	41:2 56:20
70:13 71:2,6	42:14 43:2	30:14 45:23	55:6	59:2 61:3 65:8
75:3	70:13 71:2,6	62:21 69:5	<b>offer</b> 8:11 51:17	73:3,10 75:6
<b>Medidata's</b> 7:10	<b>month</b> 21:24	<b>new</b> 1:2,19,20,22	<b>offered</b> 8:20	<b>pages</b> 57:16 58:2
12:16 13:9	22:5,7,8	2:5,5 4:11,11	<b>office</b> 4:9 21:19	58:6,12 60:12
42:12,22 63:4	<b>months</b> 9:17	4:15 5:4 10:18	21:20 27:10	<b>paid</b> 15:2
<b>meet</b> 55:23	57:7 60:20	10:18 16:12	45:12 46:16	<b>paper</b> 19:8
<b>meeting</b> 23:8	<b>morning</b> 17:21	57:8 59:18	30:3 62:25	38:21
24:4,13	<b>mouth</b> 18:12,21	74:7	<b>officer</b> 3:14	<b>paragraph</b>
<b>meetings</b> 23:9,16	<b>move</b> 16:2	<b>Nods</b> 6:16	1:18	28:10 31:18
24:5,7,20,21	<b>moved</b> 11:25	<b>nonconsecutive</b>	<b>Oh</b> 57:14 59:5	<b>Park</b> 1:19 4:10
25:6 50:7	12:7	58:2	<b>okay</b> 6:14,21,22	<b>part</b> 44:22
<b>mention</b> 34:14	<b>MT</b> 37:11,15,16	<b>Non-Party</b> 1:16	7:7,8,15,16,20	<b>partial</b> 64:19
34:23 45:11	37:19 38:2,4	<b>normal</b> 21:23	7:21 29:11,22	<b>particular</b> 21:5
<b>mentioned</b> 9:3	39:21	37:23	32:16 33:6	23:4,11 30:12
24:14,19 25:6	<b>mutual</b> 29:25	<b>normally</b> 22:13	36:21 38:3	<b>parties</b> 3:5 74:17
25:22 30:13	30:10	45:13	43:16,24 49:25	<b>Paschal</b> 2:17 4:5
34:18 41:16	<b>N</b>	<b>North</b> 2:11	58:14 59:5	<b>password</b> 13:25
45:10 49:25	<b>N</b> 2:1,16 3:1 5:2	<b>Notary</b> 1:21 5:4	65:10 67:16	14:5,14 15:21
56:22 61:12	73:1	72:25 74:6	72:5,14,15	48:10,14,23
<b>merge</b> 25:11	<b>name</b> 4:21 5:8	75:25	<b>once</b> 11:11 12:18	49:9
<b>merger</b> 24:2	14:8 26:23	<b>note</b> 26:22 58:15	14:22 16:17	<b>pay</b> 35:7 36:21
<b>Message</b> 45:2,5	27:4,9 28:8	<b>Noted</b> 72:19	22:8 37:13	53:17
<b>Meyer</b> 33:21	48:12,13,23	<b>notes</b> 74:15	44:22	<b>██████████</b> 9:10
34:5 37:6	49:9 54:10,22	<b>notify</b> 16:23,25	<b>ones</b> 45:10	10:13,15,22
40:21 44:13	55:3 56:10	<b>number</b> 14:3,8	<b>open</b> 17:18,21	11:11,23 32:6
61:14,20	65:15,21 66:2	14:15 33:25	17:22 18:6,6	57:4
<b>Meyers</b> 37:3	67:23 75:3,5	34:5,12 48:21	<b>operation</b> 28:12	<b>payment</b> 14:23
64:7	<b>named</b> 33:20	66:18	<b>operator</b> 4:5	14:24,25 16:23
<b>Michael</b> 33:20	61:14	<b>numbers</b> 19:22	<b>order</b> 12:6 13:14	17:3 22:10
34:4 37:3	<b>names</b> 27:22	19:22 35:13	14:10,11 15:18	38:17 39:7
44:12	<b>natural</b> 6:3	<b>O</b>	16:2 19:5	53:9,13 54:15
<b>million</b> 18:17,20	<b>nature</b> 6:17	<b>O</b> 2:16 3:1	35:17 36:24	59:7,21,21
20:12,16,22	68:21	<b>oath</b> 3:15	37:19 39:8	61:2 64:23
21:3,12,14	<b>necessary</b> 35:18	<b>Object</b> 62:8	48:17 49:7,8	66:15,15
70:19 71:9	42:14 54:25	<b>objection</b> 7:11	<b>original</b> 26:14	<b>payments</b> 10:21
<b>mind</b> 23:13	68:9	20:17 26:16,17	28:7 33:11	10:23,25 11:2
25:20,25 32:3	<b>need</b> 6:20 20:23	30:7 42:16	57:9	11:6 21:2,25
44:18	20:23 34:20	49:4 57:24	<b>originally</b> 52:15	22:11 59:10,15
<b>minute</b> 51:16	35:5 36:22,24	58:15 62:20	<b>outcome</b> 74:19	<b>pending</b> 7:19
<b>minutes</b> 52:10	38:23 48:18	70:22	<b>outdated</b> 57:5	<b>Pennsylvania</b>
<b>module</b> 14:24	49:25 55:20	<b>objections</b> 3:9	<b>outset</b> 56:22	4:7
54:25	64:12,15,22	<b>obtained</b> 66:18	<b>oversaw</b> 10:24	<b>people</b> 16:12,21
<b>moment</b> 12:14	<b>needed</b> 20:24	66:24 67:5	37:11	22:13 27:15
41:2				

32:7 39:7	60:12,22 61:2	<b>problem</b> 62:12	24:7	<b>receiving</b> 61:11
45:16 46:10	<b>policy/proced...</b> 58:24	<b>procedures</b> 9:15 18:24 56:24,25	<b>question</b> 3:10 6:4,6,9 7:7,13	<b>receptive</b> 63:13
<b>perfectly</b> 6:2	<b>populate</b> 55:3	58:16 70:9	7:14,19 21:9	<b>recess</b> 51:21
<b>person</b> 31:2,13	<b>portal</b> 11:7,22	<b>proceed</b> 51:23	41:18,24 58:11	<b>recipient</b> 68:2
32:11 35:25	12:4,8 13:13	<b>process</b> 20:25 36:11 37:16,17	62:10 64:5	<b>recognition</b> 16:13
38:3 43:10	13:15 14:22	41:17 51:10	<b>questions</b> 5:18 5:20 6:20,24	<b>recognize</b> 40:13 49:24 54:25
44:12,20 49:13	32:8 44:19	<b>processed</b> 10:5 44:13	7:11 36:13 59:25 62:20	<b>recollect</b> 16:8
63:10	<b>position</b> 9:25 10:8 18:22	<b>procurement</b> 57:14	70:5 71:13	<b>recollection</b> 40:6
<b>personalized</b>	24:11 46:18	<b>project</b> 10:24	<b>quite</b> 34:8	<b>record</b> 4:3 51:20
14:13,14 15:21	47:18,20	<b>promoted</b> 10:10 10:12	<hr/> <b>R</b>	51:23 62:11
15:21	<b>possibility</b> 24:25	<b>proposed</b> 15:19 16:2	<b>R</b> 2:1,16 74:1 75:1,1	71:18 72:10,18
<b>personally</b> 14:12	<b>possible</b> 38:18 38:18 39:4	<b>protocols</b> 22:21	<b>reached</b> 44:15	<b>Rees</b> 1:19 2:10
<b>person's</b> 20:9	<b>preexisting</b> 14:25	<b>provide</b> 32:21 33:25 35:14	<b>read</b> 62:11 65:11	4:10
<b>perspective</b>	<b>prepare</b> 61:16 61:21	37:21	<b>reading</b> 52:9,18	<b>reference</b> 65:13
34:22 52:15	████████ 16:8 20:12,15 24:9	<b>provided</b> 18:8 18:18 19:10,17	<b>ready</b> 16:19,23	<b>referenced</b>
<b>phone</b> 30:23	<b>press</b> 15:25	20:6,10 22:19	23:17	25:21 26:4
31:11,12 33:25	<b>prevention</b> 8:16 8:19,25	34:4 56:23,25	<b>real</b> 36:23	58:12 66:14
34:5,7,15,16	<b>previous</b> 56:6 60:20	68:8	<b>realistically</b> 46:10	<b>references</b> 53:20
34:24 37:3	<b>previously</b> 17:16 19:4 20:10	<b>Public</b> 1:21 5:4 72:25 74:7	<b>really</b> 18:22 37:7	<b>referencing</b> 25:3
38:14,15,25	30:13 34:11	75:25	45:14,15,15	<b>referring</b> 19:14
39:25 40:4	57:10	<b>purchase</b> 23:12 23:18,25 25:5	<b>reflect</b> 64:17	<b>reflect</b> 64:17
44:12	<b>pre-populated</b> 53:16	25:10,22 26:4	<b>reflected</b> 57:17 58:17 66:19	58:17 66:19
<b>physical</b> 35:11	<b>print</b> 38:19	30:5 51:13	70:11	70:11
48:19 72:13	<b>printed</b> 37:24	<b>purport</b> 67:19	<b>reflects</b> 57:25	
<b>physically</b> 24:9	<b>printout</b> 26:12 40:11 52:3,25	<b>purported</b> 61:9 61:13 64:7	<b>refused</b> 63:8	
<b>picked</b> 6:18	53:7 73:14	<b>purporting</b> 70:19	<b>regarding</b> 40:7	
<b>picture</b> 65:14,21	<b>prior</b> 8:25 22:15 22:24 23:7	<b>pursuant</b> 1:18	64:8	
65:23 66:2,5	30:24 34:11	<b>pushed</b> 51:4	<b>regards</b> 26:24	
67:23 69:15	41:14 57:7	<b>pushing</b> 51:10	28:22 50:14	
<b>pictures</b> 69:22	58:18,21 60:20	<b>put</b> 14:9 15:8 19:3,13 31:17	<b>registered</b> 14:5,6	
<b>place</b> 8:21 66:8	61:11 62:25	41:20 67:17	14:7	
74:10	63:20 64:5	<b>p.m</b> 1:21 4:3 35:13 51:20,23	<b>regulated</b> 28:12	
<b>Plaintiff</b> 1:5 2:4	65:17 70:10,16	72:18,19	<b>reimbursements</b> 10:7	
<b>Plaza</b> 1:19 4:10	70:24	<hr/> <b>Q</b>	<b>reissued</b> 46:4	
<b>please</b> 4:16,25	<b>probably</b> 24:23 26:12 32:14		<b>rejected</b> 41:20	
6:24 7:3 31:18	34:9 44:16,18		<b>related</b> 74:16	
37:14	45:22		<b>relayed</b> 20:8,14	
<b>plus</b> 14:14			30:14 38:2	
<b>point</b> 10:10 21:5			<b>release</b> 11:24	
23:11 32:2,4			12:4,8 29:13	
32:15,24 44:16			32:10,12 36:25	
48:6 49:14,17			44:21,23	
50:5			<b>released</b> 12:5	
<b>policies</b> 9:15,21			37:14	
9:22 18:23			<b>remediation</b> 55:16	
39:5 56:24,25				
70:9				
<b>policy</b> 57:4,8,9				
57:17 58:18,22				
59:14,17,18				

<b>remember</b> 22:4	68:15 71:20	<b>se</b> 71:22	61:5,18 68:7	12:7 15:14,19
31:14 43:7	72:6	<b>sealing</b> 3:5	68:10,22 69:3	16:6 18:14
56:10	<b>right-hand</b>	<b>seat</b> 43:25	69:7 70:2,10	42:18
<b>rephrase</b> 7:4	19:21	<b>SEC</b> 23:24 28:17	70:16,24	<b>signatory</b> 11:12
<b>replied</b> 29:19	<b>Rob</b> 16:16 45:12	<b>second</b> 28:10	<b>series</b> 5:19 33:19	11:16 20:25
41:25 50:15	56:2 59:20	42:2 44:20	<b>served</b> 63:15	39:15
<b>reply</b> 41:11,12	<b>rolled</b> 10:24	49:16,20 57:21	<b>services</b> 59:11	<b>signature</b> 26:23
49:23 50:10	47:19	62:17	59:19	27:25 28:2
<b>reporter</b> 4:24	<b>roughly</b> 52:10	<b>seconds</b> 14:4	<b>set</b> 11:19,20	35:11 45:3
5:23 6:12,15	<b>rules</b> 5:22	<b>section</b> 53:9 59:6	12:16,19 13:9	56:19
6:19 71:24	<hr/>	66:16,23 67:5	14:12,18,20	<b>signatures</b> 16:19
72:7,11	<b>S</b>	<b>secureop@dr....</b>	15:22 18:22	<b>signed</b> 3:13,16
<b>reporter's</b> 6:7	<b>S</b> 2:1,6,16,16 3:1	41:5	23:13 27:24	10:19 17:19
<b>reports</b> 10:6	3:1 5:2 73:8	<b>see</b> 15:19 19:20	28:3,3 29:11	35:8 42:24
<b>represent</b> 4:18	75:1,6	19:22 20:3,4	30:14 32:7,9	<b>signer</b> 12:24
4:22 5:9	<b>salutation</b> 27:16	20:11 27:12,16	32:12 37:14	46:15
<b>representing</b>	<b>saved</b> 18:5	27:17,19 28:10	42:13 43:8,9	<b>signers</b> 13:4
3:19	<b>saving</b> 28:5	28:13,23,23	45:25 46:3	42:24 51:6
<b>request</b> 7:18	<b>saw</b> 28:6 49:23	31:21 33:12,18	47:2,16,24	<b>Silicon</b> 35:18
22:10,10 36:10	57:6 66:4	34:2 35:20	59:22 64:13	<b>similar</b> 8:23
36:11 37:15,19	69:13,25	36:14 41:4	68:9 74:20	<b>single</b> 38:7
38:12 42:2	<b>saying</b> 18:13	50:2 53:9 59:6	<b>setting</b> 12:14	<b>situation</b> 23:22
49:16,18,21	23:14 36:21	66:3 69:18	13:8 16:18	<b>size</b> 69:18
61:2 63:4,4,8	44:13 68:15	72:9	26:2 42:23	<b>slightly</b> 21:4
64:15	<b>says</b> 16:4 20:11	<b>seeking</b> 59:14	<b>severance</b> 56:11	<b>small</b> 19:21
<b>requested</b> 40:21	20:12 26:24	64:18	56:15 73:16	<b>software</b> 12:16
61:16 62:11	28:11,21 31:17	<b>seen</b> 52:2,4 53:4	<b>share</b> 23:24	13:10
64:10,14	35:13 59:9	57:8,15,17	<b>shared</b> 59:11,19	<b>Solutions</b> 1:4
<b>requesting</b> 42:23	<b>Schloss</b> 55:25	60:19 69:5,8	<b>Sharif</b> 21:18	4:13 60:6
<b>Requests</b> 59:7	56:7	70:11,16	68:15,15,16,17	<b>somebody</b> 32:4
<b>require</b> 13:4	<b>Schmockler</b>	<b>select</b> 15:5 53:16	<b>Shaw</b> 16:16	33:20
37:23 59:10	2:13 4:19,20	<b>send</b> 72:2,4	45:12 46:14	<b>someone's</b> 35:9
<b>reserved</b> 3:10	5:7,9 26:19	<b>sending</b> 44:8	56:2 59:20	35:10
<b>reset</b> 48:15	51:15,24 58:5	50:13	<b>shortly</b> 31:11	<b>soon</b> 38:17
<b>respect</b> 67:3	58:9 59:24	<b>sense</b> 34:9	<b>shot</b> 26:13	<b>sorry</b> 10:4 19:11
68:17 69:21	62:8,14 64:3	58:7	<b>shoulders</b> 6:17	26:18 33:7
<b>respective</b> 3:4	67:12 70:7	<b>sent</b> 11:6 36:10	<b>show</b> 19:15,16	40:10 71:18
<b>responsibilities</b>	71:12,17,19	41:10 43:11	26:7 33:7 40:9	<b>sort</b> 13:24 15:25
10:14 47:23	72:16 73:4	50:9 64:21	43:18 44:5,5	34:18 35:6
<b>rest</b> 53:18	[REDACTED] 43:4	<b>sentence</b> 28:21	51:25 52:23	36:25 38:20
<b>restate</b> 57:24	43:17 44:3	59:9	56:14	45:14 50:13
<b>result</b> 60:8 63:7	45:8,18 46:12	<b>separate</b> 12:13	<b>showed</b> 37:25	55:15
<b>revenue</b> 16:13	55:22 73:13	58:12	47:24	<b>sorts</b> 39:10
<b>reverse</b> 19:5	<b>Scott</b> 2:13 4:19	<b>separately</b> 22:12	<b>showing</b> 52:6	<b>sounded</b> 28:16
<b>review</b> 16:20,24	5:9	23:16	<b>shrugs</b> 6:16	<b>Southern</b> 1:2
51:6 71:20,23	<b>scratch</b> 15:4	<b>September</b> 8:25	<b>sic</b> 23:5 64:8	4:15
72:2	48:2	16:7 17:23	<b>side</b> 19:13	<b>space</b> 28:5
<b>reviewing</b> 60:11	<b>screen</b> 26:13	21:10 22:15,16	<b>sign</b> 13:14 16:21	<b>speak</b> 29:7 34:13
<b>right</b> 19:3 29:22	52:3 69:13	22:24 41:15	35:16	43:4 49:11
58:10 67:13	70:2	49:7 50:18	<b>signatories</b> 12:3	50:16 62:24

<b>speaking</b> 4:5	63:15,17	72:7 74:13	27:7,13 45:16	11:20 13:19
<b>specific</b> 58:13	<b>Subscribed</b>	<b>takes</b> 5:24	60:20	15:9 21:6 30:3
<b>speculate</b> 6:25	72:22 75:22	<b>talk</b> 18:16 23:10	<b>thrown</b> 23:15	36:6,11,20
<b>spoke</b> 70:8	<b>subset</b> 58:13	23:17	24:16	37:18 38:7,7
<b>spoken</b> 62:21	<b>substance</b> 63:21	<b>talked</b> 40:22	<b>time</b> 3:10 5:17	38:10 39:8
<b>stack</b> 19:6,11	<b>suffered</b> 60:8	<b>talking</b> 6:8 25:5	7:9,18 9:20,24	46:20 47:11
<b>stamp</b> 33:9 52:7	<b>suggested</b> 22:20	<b>Tarek</b> 21:18	12:2 16:7,14	61:17 68:21
<b>stamps</b> 19:23,24	39:22	<b>team</b> 25:9	16:15 28:3	69:2
<b>stands</b> 10:3	<b>suggestion</b> 24:18	<b>telephone</b> 37:6	30:2 31:23	<b>transactions</b>
<b>stapled</b> 57:16	30:17	<b>tell</b> 6:24 7:3 10:3	32:19 33:9,14	11:4,5 12:9,15
<b>start</b> 6:4,6,10	<b>Suite</b> 2:11	37:5 39:25	34:10 36:7,7	12:19,22,25
<b>started</b> 7:24 9:16	<b>summary</b> 7:22	64:23	36:13 42:19	47:20 49:20
17:13	<b>supervisor</b> 10:2	<b>template</b> 14:25	43:10,17 45:9	<b>transcript</b> 57:23
<b>state</b> 1:21 4:17	<b>supplier</b> 10:18	48:2	45:13 46:2,3,9	58:8 71:21,23
5:4 7:25 74:7	<b>sure</b> 10:16 23:21	<b>terminate</b> 55:8	46:19 47:9,22	72:2 74:14
<b>stated</b> 60:11	28:20 31:10	<b>terminated</b>	50:17,22 51:12	<b>transfer</b> 12:14
63:10	36:6 50:8	55:11,20,22,22	52:7,11,12	13:7,8,9 14:12
<b>States</b> 1:1 4:14	71:24 72:13	<b>termination</b>	53:20 55:23	15:20,22 16:3
<b>stating</b> 31:6	<b>surprising</b> 49:21	55:24	56:2 57:18	16:18 18:16
<b>stay</b> 17:19	<b>swear</b> 4:25	<b>terms</b> 38:22	60:16,23 61:4	30:24 31:24
<b>stenographic</b>	<b>switched</b> 48:4	59:14	63:11 66:5	32:17 33:2,16
74:15	<b>sworn</b> 3:14,16	<b>testified</b> 5:5	69:7 72:19	34:19 35:23
<b>stenographic...</b>	5:3 72:22	<b>testifying</b> 3:19	74:10	37:9 38:6,13
74:13	74:11 75:22	<b>testimony</b> 63:22	<b>timely</b> 23:21	38:13 39:18,24
<b>step</b> 12:23	<b>system</b> 10:18,20	66:12 71:22,25	<b>times</b> 21:2 33:4	40:18,22 42:3
<b>step-by-step</b>	11:21 12:16	72:8 74:9,12	56:6	42:9,13 43:5
32:19	13:10,20 14:13	74:13	<b>timing</b> 38:24	45:21 46:9
<b>Steven</b> 45:17	14:17,21 16:17	<b>Thank</b> 72:16	52:15	47:3,6,10
46:13	17:14 27:21,23	<b>they'd</b> 17:4	<b>title</b> 27:9	50:20,24 51:5
<b>STIPULATED</b>	28:4 41:22	<b>thing</b> 27:20	<b>titled</b> 59:6	52:11,21 53:8
3:3,8,12	42:25 47:7,17	62:17	<b>today</b> 5:13,20	57:19 58:19
<b>stock</b> 18:24	47:25 48:18	<b>things</b> 6:17 58:4	62:22,25 63:14	60:8 61:5 62:5
<b>stone</b> 18:23	49:3 50:18,23	62:14	63:20,22	70:13,19,25
<b>stop</b> 55:5	53:21 54:5,9	<b>think</b> 8:4 9:18	<b>Today's</b> 4:3,23	71:6,9
<b>stopped</b> 60:17	54:13,17,21	17:14 25:7,8	<b>token</b> 14:3	<b>transferring</b>
<b>stored</b> 15:3 18:5	<b>systems</b> 42:12,22	25:16 29:21	<b>told</b> 7:12 37:16	34:15,23
<b>Street</b> 2:11	<b>T</b>	31:7 34:11,17	39:19 40:3	<b>transfers</b> 11:3
<b>strike</b> 40:8 46:23	<b>T</b> 2:16 3:1,1 10:2	40:2 43:7,10	44:15 55:18	11:10,17 12:11
46:25 47:13	10:3 73:8 74:1	43:12 62:15,16	56:3,5 71:8	13:3 29:7
48:25 69:6	74:1 75:1,1	67:11	<b>TORRES</b> 2:3	40:23 49:12
<b>strong</b> 24:24	<b>table</b> 20:4,6	<b>thinking</b> 32:16	<b>touch</b> 45:15	<b>transmittal</b>
<b>stronger</b> 24:22	<b>take</b> 5:12 6:12	39:10	<b>town</b> 23:8 24:5,7	37:24 38:23
<b>submit</b> 15:9,11	6:15 7:17,20	<b>thinks</b> 29:19	24:13	52:25 73:15
15:24 16:4	32:18 36:7	<b>third</b> 12:23	<b>trail</b> 38:21 52:6	<b>transmitted</b>
51:4,11	51:15	<b>thought</b> 23:15	24:16 25:15	12:20
<b>submitted</b> 15:12	<b>taken</b> 1:17 5:14	24:16 25:15	8:24 9:14,20	<b>travel</b> 10:4 41:17
15:13	6:18 8:9,15,18	28:18 30:4	48:4	<b>trial</b> 3:11
<b>submitting</b>	8:20,22,23	31:5 32:16	<b>trans</b> 40:7	<b>true</b> 26:14 49:5
15:16	51:21 71:24	43:11 49:17	<b>transacted</b> 52:7	69:21 74:14
<b>subpoena</b> 1:18		<b>three</b> 10:9 14:9	<b>transaction</b>	<b>trust</b> 72:7

try 51:17	upstairs 50:2,15	66:5,19 67:20	WHEREOF	65:19
<b>trying</b> 17:13	USD 13:5	67:23 68:14,25	<b>willing</b> 63:12	<b>working</b> 55:5
23:2,4 37:8	use 14:13 49:8	69:9,15,22	64:13	57:7 58:22,25
38:16 57:4,7	user 13:24 14:4	70:18 71:8	<b>wire</b> 8:21 11:4	60:12,15,17
<b>turn</b> 40:25	14:8,13 48:7	73:12	11:10,16 12:13	<b>worried</b> 50:5
<b>turned</b> 17:10	48:12,13,22	<b>W</b>	13:7,8,9 14:12	<b>wouldn't</b> 37:23
<b>twice</b> 22:5,7	49:9,9	<b>waiting</b> 17:3	14:18,20 15:9	<b>wow</b> 25:19
<b>two</b> 13:4,18	U.S 22:6 28:17	25:12 29:12	15:19,22 16:2	<b>write</b> 35:19 36:9
42:17,20,24	<b>V</b>	<b>waive</b> 72:6	16:18,19 18:16	<b>writing</b> 57:2
58:3 62:14	v 5:2 75:3	<b>waived</b> 3:7	22:9,9 26:2	69:6 70:17
<b>type</b> 8:7 23:25	Valley 35:19	<b>walk</b> 17:2 43:14	29:6,11 30:24	<b>X</b>
28:20 38:10,22	various 27:15	<b>walked</b> 29:8	32:4,7 34:23	x 1:3,11 73:1,8
41:9 44:11	66:10 68:13	43:17,24	35:23 36:11	<b>Y</b>
71:21	vendor 10:18,23	<b>want</b> 6:25 27:25	37:10,14,18,23	<b>Yeah</b> 35:2 72:9
<b>typed</b> 26:23 27:4	vendors 21:25	28:2 32:18	37:24 38:6	<b>year</b> 23:8 24:6
<b>typing</b> 5:25	22:5,6,7	35:3 39:23	39:18,23 40:7	<b>years</b> 8:14 10:9
65:19	verbal 6:16	57:22 71:23,25	40:18,23 42:2	10:21
<b>U</b>	verbalize 6:20	72:12	42:8,13,23,23	<b>York</b> 1:2,20,20
<b>U</b> 3:1	verbally 20:8	<b>wanted</b> 15:8	42:25 43:5,8,9	1:22 2:5,5 4:11
<b>uh-huh</b> 19:7,9	version 60:19	19:15 27:19	44:14,23 45:8	4:11,15 5:4
28:25 33:13	66:4	37:10 39:3,13	45:20 46:9,11	74:7
36:15 41:3,6	<b>versus</b> 4:13	53:17	47:3,6,10,19	<b>Z</b>
52:17 61:10	40:23	<b>wasn't</b> 17:15	49:6,8,12,15	<b>Ziffer</b> 2:6 4:21
<b>ultimately</b> 35:22	<b>vice-president</b>	28:17,20 49:21	49:17,18 50:20	4:22 20:17
39:17 42:8,14	59:11	62:2 63:11,13	50:24 51:5	26:16 30:7,9
49:11 52:21	<b>video</b> 4:4 6:18	65:23	52:11,20,25	42:16 49:4
64:4	VIDEOGRAP...	<b>way</b> 7:2 37:8	53:8,19 55:19	57:20 58:7,14
<b>Um</b> 63:2 69:20	2:17 4:2,23	38:17,18 39:19	60:8 61:5,16	60:3,5 62:9,12
<b>undergoing</b>	51:19,22 71:14	43:20 48:24	61:22 62:5	63:25 70:4,22
28:23	72:17	49:2 50:19	64:9,13,21	73:5
<b>understand</b> 6:23	<b>videotaped</b> 1:16	70:17 74:18	68:9 73:14	<b>\$</b>
7:3,5,13 13:21	4:8	<b>ways</b> 39:11	wires 13:12 22:6	\$1.5 20:16
14:11 21:5	<b>view</b> 15:14,16	<b>webcast</b> 24:9	38:9 47:16,25	\$25,000 13:5
24:3 25:25	17:4	<b>website</b> 13:22	<b>wiring</b> 11:8	\$4 18:17,20
65:6	<b>Virginia</b> 7:25	<b>went</b> 8:11 10:22	<b>witness</b> 1:17	21:12,14 70:19
<b>understanding</b>	voice 4:16	13:20 29:7,8	3:19 4:25 5:2	71:9
29:2,25 30:11	VP 16:12,14	31:10 34:11,19	30:8 73:3	<b>1</b>
32:20 45:19	59:19	35:22 36:6	74:11,20	1 2:11 4:11 19:6
68:20,24	████████ 21:7,11	41:5 50:15	<b>WITNESS'S</b>	57:16 58:23
<b>understood</b> 7:6	25:3,16 26:10	52:12 54:5,9	75:5	60:10 72:18
50:22 51:3	26:15 27:4	54:13,17,21	<b>wondering</b>	<b>1.5</b> 20:12,22
68:8,14,23	28:7 31:6	<b>weren't</b> 11:15	18:18 19:10	21:3
<b>unilaterally</b>	33:12,20 34:21	39:21	<b>word</b> 18:12,21	<b>1:15-cv-00090...</b>
70:18 71:8	35:16 40:7,12	<b>we'll</b> 72:13	28:24	1:6
<b>United</b> 1:1 4:14	41:5,9,14	<b>we're</b> 5:12 6:8	<b>word-for-word</b>	1:32 35:13
<b>University</b> 8:2	43:19 45:20	18:16 51:22	5:24	
<b>untoward</b> 25:17	49:12 61:9	72:10,17	<b>work</b> 9:4,7 21:19	
<b>update</b> 57:5	64:16,22 65:5	<b>we've</b> 51:16	27:10 36:2,4	
<b>uploaded</b> 11:22	65:9,14,15,18	67:14		

<b>1:41</b> 1:21 4:3	16:7 17:23	<b>9</b>
<b>10</b> 10:21	21:10 22:16,24	
<b>10004</b> 1:20	23:7 55:7 61:5	
<b>10019</b> 2:5	69:7 70:2	
<b>103</b> 37:10,11,15	<b>2015</b> 1:20 4:4	
37:17,19 38:2	9:12 72:23	
38:4 39:21	75:4	
<b>1069</b> 56:20	<b>22nd</b> 9:18	
<b>11</b> 19:17,18	<b>25</b> 1:20 75:4	
57:12,13	<b>25th</b> 4:4	
<b>11:12</b> 32:25	<b>26</b> 73:12	
33:12,15 52:16		
<b>11:52</b> 33:23	<b>3</b>	
<b>12</b> 33:8,11 40:10	<b>3</b> 67:9,11,14,14	
40:25 52:16	67:18,19,22	
57:10,12	68:3 69:22,25	
<b>13</b> 40:10 61:7,8	<b>3:11</b> 72:18,19	
64:17 65:3,8	<b>30</b> 72:3	
66:7,20,25	<b>30th</b> 74:21	
67:6,15,18,19	<b>327</b> 41:2	
67:22 68:3	<b>329</b> 35:12	
69:12,19	<b>34</b> 52:10	
<b>14</b> 26:8,10,13		
67:9,14,18,19	<b>4</b>	
67:22 68:3	<b>44</b> 73:13	
69:22,25 73:11		
<b>15</b> 44:3,6,25	<b>5</b>	
73:13	<b>5</b> 73:4	
<b>16</b> 22:15,24 49:7	<b>53</b> 73:15	
50:18 52:24	<b>56</b> 73:16	
53:2,6 58:19		
61:5 66:8,10	<b>6</b>	
66:24 67:5	<b>6</b> 52:2	
68:7,22 69:3,7	<b>60</b> 73:5	
70:2,16 73:14	<b>60606</b> 2:12	
<b>16th</b> 41:15 57:19		
61:18 68:10	<b>7</b>	
70:10,24	<b>70</b> 73:4	
<b>1633</b> 2:4	<b>719</b> 57:18 58:17	
<b>17</b> 56:12,15	<b>728</b> 58:21,24	
73:16	60:13	
	<b>729</b> 58:24 59:7	
	61:3	
<b>2</b>	<b>730</b> 57:18 58:17	
<b>2:41</b> 51:20	58:24 59:4	
<b>2:47</b> 51:23	60:13	
<b>20</b> 75:23	<b>731</b> 59:2	
<b>2009</b> 9:5	<b>764</b> 20:3	
<b>2010</b> 9:18		
<b>2012</b> 74:21	<b>8</b>	
<b>2014</b> 8:25 9:6	<b>800</b> 2:11	